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Safety, Health & Environment Excellence Center  
1007 Market Street, DuPont 6082  
Wilmington, DE 19898  
302-773-0910 (Office) – 302-774-3140 (Fax)

December 1, 2005

Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

Dear Sir,

E. I. Du Pont de Nemours and Company, Inc. requests the transfer of commitments of 26 chemicals under the High Production Volume Program to INVISTA S.ä.r.l. You have previously received a letter from INVISTA also requesting this transfer of commitments, a copy of which is enclosed. The chemicals are:

| Chemical   | CAS Number |
|--|------------|
| Cyclohexanol   | 108-93-0   |
| Hexamethyleneimine   | 111-49-9   |
| 4-Pentenitrile   | 592-51-8   |
| 3-Pentenitrile   | 4635-87-4  |
| 2-Methyl-3-Butenenitrile   | 16529-56-9 |
| Trans-2-Pentenitrile   | 26294-98-4 |
| Cis-2-Pentenitrile   | 25899-50-7 |
| 1,5-Cyclooctadiene   | 111-78-4   |
| 1,2-Cyclohexanediamine   | 694-83-7   |
| 2-Methyl-1,5-Pentanediamine  | 15520-10-2 |
| Reaction Product (Adiponitrile/Hydrogen) High-Boiling Fraction                       | 68411-90-5 |
| Triisopropyl borate  | 5419-55-6  |
| Triphenylborane  | 960-71-4   |
| Sodium Hydroxytriphenylborate  | 12113-07-4 |
| Acetylene  | 74-86-2    |
| 4-Vinylcyclohexene   | 100-40-3   |
| Succinic Acid  | 110-15-6   |
| Glutaric Acid  | 110-94-1   |
| Adipic Acid  | 124-04-9   |
| 2-Methylglutaronitrile   | 4553-62-2  |
| Ethylsuccinonitrile  | 17611-82-4 |
| 1,5,9-Cyclododecatriene  | 4904-61-4  |
| Dimethylsuccinate  | 106-65-0   |
| Dimethyladipate  | 627-93-0   |
| Dimethylglutarate  | 1119-40-0  |
| Reaction Product (Cyclododecanol/Cyclododecanone/Nitric Acid), High-Boiling Fraction | 72162-23-3 |

The commitments are being transferred from DuPont to INVISTA as a result of the sale of the businesses associated with these chemicals to Koch Industries, Inc. INVISTA S.ä.r.l. is wholly owned by Koch Industries, Inc.

Except for 4-vinylcyclohexene, all listed chemicals have had an initial robust summary submitted and are either waiting for comments, gathering information to respond to EPA's comments, or implementing the proposed test plan.

Please feel free to contact me with any questions or concerns you may have with regards to this submission at [Edwin.L.Mongan-1@usa.dupont.com](mailto:Edwin.L.Mongan-1@usa.dupont.com) or by phone at 302-773-0910.

Sincerely,

Edwin L. Mongan, III  
Global Manager, Energy and Environment  
DuPont Safety, Health & Environment

Cc: Mr. Walter J. Cybulski, Ph. D.  
U. S. Environmental Protection Agency  
Office of Pollution Prevention & Toxics  
Chemical Control Division  
EPA East – Room 4410-G, Mail Code 7405M  
1200 Penn Ave NW  
Washington, DC 20460